

Exhibit A  
State Court  
Summons & Complaint  
Case No. A-22-852200-C

Electronically Issued  
5/5/2022 4:09 PM

RECEIVED

2022 MAY 10 AM 10:51 *me*U.S. ATTORNEY'S OFFICE  
LAS VEGAS, NV**SEI**

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*Attorneys for Plaintiff*

**DISTRICT COURT****CLARK COUNTY, NEVADA**

JOHN VAN STEENIS, individually,

Plaintiff,

vs.

RICKEY C. KENDRICK, individually; UNITED  
STATES POSTAL SERVICE,; DOES I-X, and  
ROE CORPORATIONS INC.

Defendants.

) **CASE NO: A-22-852200-C**) **CASE NO.**) **DEPT. NO** Department 30

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**NOTICE! YOU HAVE BEEN SUED, THE COURT MAY DECIDE AGAINST YOU WITHOUT  
YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS, READ THE INFORMATION  
BELOW.**

**UNITED STATES POSTAL SERVICE**

**TO THE DEFENDANT(S):** A civil Complaint has been filed by the Plaintiff(s) against you for the relief set forth in the Complaint.

1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the day of service, you must do the following:

a. File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee.

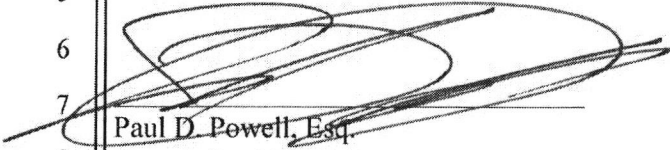
b. Serve a copy of your response upon the attorney whose name and address is shown below.

2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and this Court may enter a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint

3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

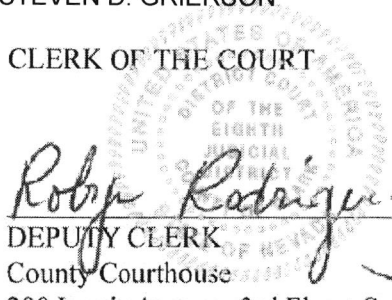
1 4. The State of Nevada , its political subdivisions, agencies , officers, board members, commission members and  
2 legislators , each have 45 days after service of this summons within which to file an answer or other responsive pleading  
3 to the complaint.

4 Issued at the direction of:

5  
6   
7 Paul D. Powell, Esq.  
8 Nevada Bar No. 7448  
9 Jared D. Powell, Esq.  
10 Nevada Bar No. 15086  
11 Tom W. Stewart, Esq.  
12 Nevada Bar No. 14280  
13 Jonathon C. Roberts, Esq.  
14 Nevada Bar No. 13573  
15 THE POWELL LAW FIRM  
16 8918 Spanish Ridge Avenue, Suite 100  
17 Las Vegas, Nevada 89148  
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STEVEN D. GRIERSON

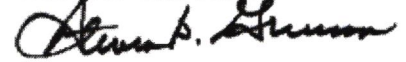
CLERK OF THE COURT

  
Robyn Rodriguez  
DEPUTY CLERK  
County Courthouse  
200 Lewis Avenue, 3rd Floor, Suite 3125  
Las Vegas, Nevada 89155  
Robyn Rodriguez

5/5/2022

DATE

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Steven D. Grierson  
CLERK OF THE COURT



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Department 30

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

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STATES POSTAL SERVICE; DOES I-X, and ROE  
CORPORATIONS INC.

Defendants.

CASE NO.  
DEPT. NO.

**COMPLAINT**

Plaintiff JOHN VAN STEENIS by and through his attorney of record, PAUL D. POWELL, ESQ., of THE POWELL LAW FIRM, complains against Defendants RICKEY C. KENDRICK and UNITED STATES POSTAL SERVICE as follows:

**GENERAL ALLEGATIONS**

1. Plaintiff JOHN VAN STEENIS (hereinafter "Plaintiff") is, and at all times mentioned herein, was, a resident of the County of Las Vegas, State of Nevada.
2. Defendant RICKEY C. KENDRICK is, and at all times mentioned herein, was, a resident of County of Clark, State of Nevada.

- 1           3. Defendant UNITED STATES POSTAL SERVICE is, and at all times mentioned  
2           herein, was, an independent agency of the executive branch of the United States  
3           federal government.
- 4           4. The true names and capacities of the Defendants designated herein as Doe or Roe  
5           Corporations are presently unknown to Plaintiff at this time, who therefore sues said  
6           Defendants by such fictitious names. When the true names and capacities of these  
7           Defendants are ascertained, Plaintiff will amend this Complaint accordingly said  
8           Does include but are not limited to unknown freight brokers, trucking companies,  
9           and third-party logistical companies.
- 10          5. At all times pertinent, Defendants were agents, servants, employees or joint  
11          venturers of every other Defendant herein, and at all times mentioned herein were  
12          acting within the scope and course of said agency, employment, or joint venture,  
13          with knowledge and permission and consent of all other named Defendants.
- 14          6. Defendant, RICKEY C. KENDRICK, is, and at all times mentioned herein, was, the  
15          driver of a United States Postal Service vehicle, (hereinafter "Vehicle").
- 16          7. Defendant, UNITED STATES POSTAL SERVICE, is, was, at all times mentioned  
17          herein, the owner of the Vehicle.
- 18          8. At all times mentioned herein, Defendant, RICKEY C. KENDRICK, was driving  
19          Defendant, UNITED STATES POSTAL SERVICE's vehicle with permission from  
20          Defendant UNITED STATES POSTAL SERVICE.
- 21          9. On February 16, 2021, in Clark County, Nevada, Defendant, RICKEY C.  
22          KENDRICK, was the driver of a vehicle owned by Defendant, UNITED STATES  
23          POSTAL SERVICE – while in the course and scope of his employment with  
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1 UNITED STATES POSTAL SERVICE – and negligently caused a crash with  
2 Plaintiff. Plaintiff reserves the right to name additional UNITED STATES POSTAL  
3 SERVICE employees as the driver of the vehicle at the time of the crash.  
4

5 10. As a direct and proximate result of Defendant, RICKEY C. KENDRICK's  
6 negligence, Plaintiff sustained injuries to Plaintiff's shoulders, back, bodily limbs,  
7 organs and systems, all or some of which conditions may be permanent and  
8 disabling, and all to Plaintiff's damages in a sum in excess of \$15,000.00.  
9

10 11. As a direct and proximate result of Defendant, RICKEY C. KENDRICK's  
11 negligence, Plaintiff received medical and other treatment for the aforementioned  
12 injuries, and that said services, all to the damages of Plaintiff.  
13

14 12. As a direct and proximate result of Defendant, RICKEY C. KENDRICK's  
15 negligence, Plaintiff has been required to, and has limited occupational and  
16 recreational activities, which have caused and shall continue to cause Plaintiff loss of  
17 earning capacity, lost wages, physical impairment, mental anguish, and loss of  
18 enjoyment of life, in a presently unascertainable amount.  
19

20 13. As a direct and proximate result of the aforementioned negligence of all Defendants,  
21 Plaintiff has been required to engage the services of an attorney, incurring attorney's  
22 fees and costs to bring this action.  
23

24 **FIRST CAUSE OF ACTION**

25 14. Plaintiff incorporates paragraphs 1 through 14 of the Complaint as though said  
26 paragraphs were fully set forth herein.  
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28

- 1           15. Defendant, RICKEY C. KENDRICK, owed Plaintiff a duty of care to operate the
- 2           Vehicle in a reasonable and safe manner. Defendant, RICKEY C. KENDRICK,
- 3           breached that duty of care by striking Plaintiff with his vehicle.
- 4
- 5           16. The acts of Defendant, RICKEY C. KENDRICK, as described herein violated the
- 6           traffic laws of the State of Nevada and Clark County.
- 7
- 8           17. Plaintiff is in the class of individuals who are meant to be protected pursuant to the
- 9           statute(s) violated by Defendant.
- 10          18. Defendant, RICKEY C. KENDRICK's actions and statutory violation constitute
- 11          negligence per se.
- 12          19. Defendant, RICKEY C. KENDRICK, was an employee of Defendant, UNITED
- 13          STATES POSTAL SERVICE, at the time of the acts complained of herein.
- 14
- 15          20. Defendant, RICKEY C. KENDRICK, was in the course and scope of his
- 16          employment with Defendant, UNITED STATES POSTAL SERVICE, at the time of
- 17          the acts complained of herein.
- 18          21. Because Defendant, RICKEY C. KENDRICK, was in the course and scope of his
- 19          employment with Defendant, UNITED STATES POSTAL SERVICE, at the time of
- 20          the crash, Defendant, UNITED STATES POSTAL SERVICE, is liable for
- 21          Defendant, RICKEY C. KENDRICK's actions based on the doctrine of respondeat
- 22          superior.
- 23
- 24          22. As a direct and proximate result of the negligence of Defendant, RICKEY C.
- 25          KENDRICK, Plaintiff has been damaged in an amount in excess of \$15,000.00.
- 26

27       ///

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**SECOND CAUSE OF ACTION**

23. Plaintiff incorporates paragraphs 1 through 23 of the Complaint as though said paragraphs were fully set forth herein.

24. Defendant, UNITED STATES POSTAL SERVICE, was the owner, or had custody and control of the Vehicle. Defendant, UNITED STATES POSTAL SERVICE, did entrust the Vehicle to the control of Defendant, RICKEY C. KENDRICK.

25. Defendant, RICKEY C. KENDRICK, was incompetent, inexperienced, or reckless in the operation of the Vehicle.

26. Defendant, UNITED STATES POSTAL SERVICE, actually knew, or by the exercise of reasonable care, should have known, that Defendant, RICKEY C. KENDRICK, was incompetent, inexperienced, or reckless in the operation of motor vehicles.

27. Plaintiff was injured as a proximate consequence of the negligence and incompetence of Defendant, RICKEY C. KENDRICK.

28. As a direct and proximate cause of the negligent entrustment of the Vehicle by Defendant, UNITED STATES POSTAL SERVICE, to Defendant, RICKEY C. KENDRICK, Plaintiff has been damaged in an amount in excess of \$15,000.00.

WHEREFORE, Plaintiff expressly reserves the right to amend this Complaint prior to or at the time of trial of this action, to insert those items of damage not yet fully ascertainable, and pray judgment against all Defendants, and each of them, as follows:

1. For general damages sustained by Plaintiff in an amount in excess of \$15,000.00;
2. For special damages sustained by Plaintiff in an amount in excess of \$15,000.00;
3. For property damages sustained by Plaintiff;



- 1 4. For reasonable attorney's fees and costs;
- 2 5. For interest at the statutory rate;
- 3 6. Plaintiff specifically seeks damages not to exceed \$74,999.99; and
- 4 7. For such other further relief as the Court deems just and proper.

5 DATED this 5<sup>th</sup> day of May, 2022.

6 THE PAUL POWELL LAW FIRM

7 */s/ Jonathon C. Roberts*

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